

BROTHERS PROPERTY MANAGEMENT CORPORATION; OUT BACK KAYAK, INC., OBK; and MARTIN WELCH

DEPOSITION OF MARTIN WELCH

Deposition taken by agreement of counsel
at the law office of Primmer, Piper,
Eggleston & Cramer, P.C., 106 Main Street,
Littleton, New Hampshire, on Monday, May 2,
2016, commencing at 1:15 p.m.

Court Reporter:

Michelle Perrier Cole

Licensed Court Reporter

NH LCR No. 78 (RSA 310-A)

1 A. Yes.

2 Q. I'm going to show you this one. See if I get
3 this right. So that's the trail up there. She came
4 over the trail and the trail right there turns left.
5 You were around where those trees are stopped?

6 A. I was at the mouth of it way over here.

7 Q. Okay.

8 A. First time.

9 Q. And she came right over there, correct?

10 A. She came right over that brush pile and right
11 down here.

12 Q. And this actually is quite a downhill?

13 A. It is steep.

14 Q. Okay. And the -- if she had followed it
15 properly, she would have -- at the top of that knoll,
16 she would have taken a left to where you were,
17 correct?

18 A. She would have stopped right behind me. She
19 wouldn't even have to take a left. All she had to do
20 was stop. I was stopped before we got to the
21 left-hand turn. I was in the field just barely out of
22 the field, just right there in the opening.

23 Q. Okay.

1 A. So I could see up the trail, make sure no more
2 snow machines were coming down, being safe.

3 Q. Once you take a left there, is that -- does the
4 trail narrow down there?

5 A. Yes. That's why I bunch them up there.

6 Q. Because you want to make sure there's no trouble
7 with cross traffic?

8 A. That plus I've got to climb that steep hill, as
9 I said.

10 Q. That hill gets steep up there, does it?

11 A. Yeah, power line.

12 Q. Okay.

13 A. Very steep.

14 Q. And this is pretty steep as depicted on this
15 photo P7 -- excuse me, F7, Fish & Game 7?

16 A. Yes.

17 Q. Is the discoloration fluids from the --
18 Jennifer's snow machine?

19 A. I have no idea. As far as I know, the fluids
20 didn't come out of that machine.

21 Q. Who is that down there; do you know?

22 A. I have no idea.

23 Q. Can you see a person with a yellow jacket?